

From: Rand Crafts
To: Milka Radulovic
Date: Tue, Feb 10, 2004 10:16 AM
Subject: Questions on ITA for IPP

Milka,

A couple of things.

First, you had a question on the LNB replacement-in-kind with no increase in CO. Since CO was not a design parameter in 1980 for the original construction of IPP, we have to look at other areas to assert that CO does not increase in the burner replacement. I have a two-fold discussion on this. First, the limiting factor for CO emissions will be OFA, and the contribution from the burners will remain the same as it was with the current burners, whereby the CO limit established by OFA operation will not increase overall.

Second, the vendor guarantees no increase in unburned carbon with the new burners, another indication that CO would not increase due to the burner replacement.

Regarding your NOx calculation question - we needed some yardstick to project to what degree we would have to control NOx to keep the uprate project minor. Our worst case assumption was that the increase in fuel throughput might cause us to "fire harder", causing the NOx generation to be proportionately higher than fuel flow. We have since found that such is not the case. We were operating so far below the capacity curve for the burners, that they easily handled additional heat input with relatively minor changes in NOx generation.

Hope I answered your questions. Now, my turn.

We want to formalize our response to you regarding Grand Canyon Trust's comments, and will be sending that out tomorrow. Did you have any heartache with our discussion beyond the treatment of LNB's (I've fixed that.) I know you had a different approach to the BACT discussion, so if I should change our letter, please let me know.

Thanks.

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